

## **Guidance for Completing Paperwork Reduction Act (PRA) Submission**

The purpose of the PRA is to minimize the paperwork burden on members of the public resulting from the collection of information by or the Federal Government.

To comply with the PRA and its implementing regulations, federal agencies must complete an Information Collection Request (ICR) which consists of a set of documents that **describe what information is needed, why it is needed, how it will be collected, and how much collecting the information will cost the respondents and the government**. A PRA request must be completed and OMB approval must be granted for any situation where 10 or more public respondents are involved and questions are standardized in nature.

**The total PRA process takes approximately 6-9 months from beginning to end**

### **Authority:**

- Chapter 35 of Title 44 U.S.C. and its implementing regulation 5 CFR 1320 covers the policy for collection Information from the public
- DoD Instruction 8910.1 provides DoD policy and procedures for collecting information from the public
- Chapter 3 of DoD 8910.1-M provides the details of the submission process

**In order to obtain an OMB Control Number (approval) for a new information collection or to have an existing one extended, please complete all of the required (attached) documents listed below. They are as follows:**

**(1) 60-Day Federal Register Notice (FRN)-** This is the **"first step"** in the process and alerts the public that the collection of information is being considered and also invites public comment (for 60 days) on the proposal. (Please fill in all the highlighted sections with your agency's information specific to the collection.) It is recommended that you submit your 60-Day notice in advance of submitting your 83-I and other supporting documentation.

**(2) Paperwork Reduction Act Submission (OMB 83-I)** - This is the **"second step"** in the process. This form is a (snapshot view) official application required by OMB for reviewing your proposed information collection.

This form contains essential data that OMB also utilizes to evaluate your PRA request. (Basically, the information reflected in your supporting statement should mirror what you have reflected on this form.) Please fully complete all areas of the form and ensure the following information is reflected as indicated below in the following blocks:

- **In block #1** of the 83-I, please ensure to state: **Dept of Defense** in front of your agency address.
- **In block #18** list the action officer preparing this request

- **In block #19 a.** (1) it should be certified by your Division Chief, someone in the grade of GS-15 or equivalent
- **In block #19 b.** (1) & (2) please leave blank. (This will be signed off by the DoD Clearance Officer for submission to OMB.)

**(3) Supporting Statement A and Attachments-** This is the **"third step"** in the process and is **mandatory** for all PRA Information Collection Requests.

This is your agency's justification for the collection activity (all questions must be thoroughly answered and if a topic does not relate to the information collection request, enter the title of the subject and state "this section does not apply" and briefly explain why. Please do not simply enter ("Not Applicable or NA"). Please ensure to provide valid detailed information to support your request.

The supporting statement includes narrative information explaining the purpose, scope, and benefits(s) of the collection. Items generally included in the supporting statement include:

- Cite the authorizing legislation (public law, executive order, etc.) or the pertinent regulations collection that is being carried out pursuant to the proposed rulemaking.
- Cite the initial 60-Day Federal Register notice (Step 1) notifying the public of the proposed information collection and soliciting comment
- Attachments should include the data collection instruments forms, questionnaires, surveys, interview guide(s), interview script(s) or other instruments that will be used for the collection. Attach any instructions for completing the information collection.

The quality of the **Supporting Statement A** is a "key factor" and is the main document used by OMB to assess the collection.

**(4) Supporting Statement B- Part B** is only required when a "Survey" being used as the collection instrument. Part B, specifically addresses the survey methods used, expected response rates and analysis of the data gathered.

**(5) Agency Disclosure (ADN)** all collections, instruments, (forms, surveys, questionnaires, etc.) must have the ADN displayed at the top of the form or at the beginning of the survey.

**(6)** Once our office (Army- Information Management Control Officer-(IMCO)) has received and thoroughly reviewed your completed draft PRA request, we will work closely with the proponent action officer to ensure the necessary changes, corrections or revisions are made in order to finalize the PRA request prior to submission to the DOD Clearance Officer, Washington Headquarters Services Directorate, Information Management Division.

(7) Upon receipt of the PRA request, the DoD Clearance Office will also conduct a stringent review and at this time (barring no changes or rewrites, etc.) the DOD Clearance Officer will also publish a 30-Day Federal Register Notice (FRN). The 30 day notice resembles the 60 day notice with a few slight changes. The DOD Clearance Office will develop and submit this document once the package is complete and final. This is the second opportunity for public comment and which also notifies the public that the clearance request has been submitted to OMB and that they have an opportunity to comment on the final version of PRA request. (All comments must go to OMB). Publication of the 30-Day FRN occurs prior to the PRA submission to OMB. The DoD Clearance Officer submits the PRA request to OMB and once OMB has received the PRA request, the 60-day OMB review begins.

(8) The total OMB period of 60 days includes the 30-day public comment described in **para (7)** and OMB's formal 30-day review period. **(OMB's 30-day review period does not begin until the 30-day public comment period has lapsed.)** During the 60-Day review period, discussions or negotiations concerning your PRA request may occur between the DoD component and OMB by either e-mail, conference call, or in person meetings. Comments received from the public during this review period can also be discussed at this time.

(9) At the conclusion of the 60-Day OMB review, OMB issues a Notice of Action (NOA). The OMB Notice of Action contains one of three responses: **Approval, Disapproval with the process of appeal, or Withdrawal**. However, if the PRA request is approved, a Report Control Symbol and expiration date will be assigned to the PRA Information Collection Request. The symbol must be used for all subsequent documentation concerning the information collection. Additionally, terms of clearance can be attached to the PRA request. If the final approval is not granted, the information may be not be collected. Collecting information that has not been approved by OMB is a direct violation of Public Law 96-511. (\*\*OMB Approval of a PRA request is for a maximum of 3 years.)

(10) **Reminder**: the approval process from start to finish could take upwards 150 days (6 to 9 months) due to all of the required reviews, FRN publication timelines and coordination's.

(11) Please remember to thoroughly review your proposed PRA package for accuracy and consistency.

(12) **PRA Review Checklist** Please utilize the "PRA Review Checklist" as an aid to assist you of ensuring that you have properly prepared and submitted all the required documents prior to emailing the completed package to our office.

(13) **Upon completion of the (attached) required documents, please email your completed documents to the Army MICO email Mailbox Address at:**

[usarmy.belvoir.hqda-rmda.mbx.rmd-information-collection@mail.mil](mailto:usarmy.belvoir.hqda-rmda.mbx.rmd-information-collection@mail.mil)

(14) In the **"Subject line" of your return email**, or any future emails that pertain to your PRA request, please list the Title, SORN number, etc. This is critical for tracking purposes.

(15) We hope the aforementioned information will assist you in preparing a quality PRA request and if you require any further assistance please do not hesitate to contact us at:

[usarmy.belvoir.hqda-rmda.mbx.rmd-information-collection@mail.mil](mailto:usarmy.belvoir.hqda-rmda.mbx.rmd-information-collection@mail.mil)

**(16)** Again our contact information is as follows:

**RMDA IMCO Group Email address:**

[usarmy.belvoir.hqda-rmda.mbx.rmd-information-collection@mail.mil](mailto:usarmy.belvoir.hqda-rmda.mbx.rmd-information-collection@mail.mil)

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Asst MICO [laverne.lashley@us.army.mil](mailto:laverne.lashley@us.army.mil) (Laverne) (703) 428-6321

**(17)** Thank-you and have a good day.